

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

| | | |
|--------------------------------|---|------------------|
| _____ |) | |
| DODORA UNIFIED COMMUNICATIONS, |) | |
| INC., |) | |
| Plaintiff, |) | |
| |) | Civil Action No. |
| v. |) | 05-10016-NMG |
| |) | |
| DIRECT INFORMATION PVT. LTD., |) | |
| LOGICBOXES, WEBHOSTING. INFO., |) | |
| TRANSECUTE (I) PVT. LTD., |) | |
| RESELLERSRS, INC., AND |) | |
| ANSWERABLE, INC., COLLECTIVELY |) | |
| d/b/a "DIRECTI.COM" |) | |
| Defendants. |) | |
| _____ |) | |

**DEFENDANTS' STATEMENT CONCERNING PROPOSED EXTENSION
OF DEADLINES FOR DISCOVERY AND FOR TRIAL**

The defendants¹ agree that because the plaintiff, Dodora Unified Communications, Inc. ("Dodora"), was unable to meet the discovery obligations set forth in the Court's January 21, 2005, order, some extension of the deadlines the Court ordered is necessary. However, the defendants note that Dodora has not proposed a specific schedule. The defendants request that the Court order the proposed modified schedule, attached to this motion, which tracks the original schedule, as delayed as requested by Dodora. The proposed schedule assumes that Dodora can comply with what it has promised, in its motion to amend the scheduling order, it would be able to do and further takes into account a scheduling conflict that counsel for the defendants mentioned at the January 21 hearing, which is a business trip to Turkey from May 10 through May 15, 2005.

The defendants also note that, pursuant to the Court's original order, they served on Dodora, on February 14, their automatic disclosure and discovery requests. Dodora has not yet provided its automatic disclosure, and it served a document request only on March 9, along with its motion to amend the scheduling order. In addition, Directi transmitted to Dodora, on March 1, 2005, the various Dodora customer e-mails discussed in connection with the motion for a preliminary injunction, which the Court ordered to be produced and which would have been produced in any event as part of Directi's responses to discovery requests or the automatic disclosure. On March 8, 2005, Directi produced to Dodora spreadsheets containing customer contact and other information concerning the various domain names purportedly at issue in this case; again, without having received any discovery requests. Accordingly, Directi has largely complied with its document discovery obligations before even receiving a document request from Dodora.

Respectfully submitted,

DIRECT INFORMATION PVT. LTD.,
By its attorneys,

s/Dustin F. Hecker

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Dated: March 10, 2005

¹ As the Court knows, the defendants other than Direct Information Pvt. Ltd. ("Directi") and Answerable, Inc. have filed a motion to dismiss, which has not yet been decided. Accordingly, this statement is provided without prejudice to the defendants' position as set forth in that motion.

CERTIFICATE OF SERVICE

I, Dustin F. Hecker, hereby certify that on this 10th day of March, 2005, I caused a copy of the foregoing to be served by mail, to: David Baker, Esq., 105 Union Wharf, Boston, Massachusetts 02109.

s/Dustin F. Hecker

Dustin F. Hecker, Esq.

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DISTRICT OF MASSACHUSETTS
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DODORA UNIFIED COMMUNICATIONS,
INC.,

Plaintiff,

v.

DIRECT INFORMATION PVT. LTD.,
LOGICBOXES, WEBHOSTING. INFO.,
TRANSECUTE (I) PVT. LTD.,
RESELLERSRS, INC., AND
ANSWERABLE, INC., COLLECTIVELY
d/b/a "DIRECTI.COM"

Defendants.

Civil Action No.
05-10016-NMG

[PROPOSED] AMENDED SCHEDULING ORDER

The Court orders the following amended scheduling order, at the request of the plaintiff,

Dodora Unified Communications, Inc.

1. All discovery requests and all automatic disclosures will be served by no later than March 14, 2005.
2. All discovery responses will be served by no later than March 28, 2005.
3. All experts will be identified by no later than April 22, 2005 and all expert witness reports required under Fed. R. Civ. Pro. 26 will be served on that date as well.
4. All depositions will be completed by no later than April 29, 2005.
5. All expert depositions will be completed by no later than May 6, 2005.
6. All motions in limine will be served and witnesses and exhibit lists will be exchanged by no later than May 20, 2005.

7. All responses to motions in limine and all objections to witness lists or exhibits will be served no later than May 27, 2005 and joint proposed voir dire questions will be served on May 27.
8. A jury trial will commence on June 6, 2005.

So ordered:
